

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Harrisburg Division*

IN RE: BARBARA ANN BUTLER	Case No. 1:22-bk-02337-HWV
Freedom Mortgage Corporation, Movant	Chapter 13
vs.	
BARBARA ANN BUTLER, Debtor	

**NOTICE OF MORTGAGE FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

NOW COMES Creditor, Freedom Mortgage Corporation (“CREDITOR”), by and through undersigned counsel, and hereby submits Notice to the Court of the forbearance offer with respect to Creditor’s residential mortgage claim which is identified on the Court’s claim register as Claim No. 5 (the “Claim”).

The Claim is eligible for a forbearance period based upon the Debtor material financial hardship caused by the COVID-19 pandemic. As a result, the Debtor shall not be required to tender mortgage payments to Creditor that would come due on the Claim starting September 1, 2022 through May 31, 2023.

Creditor, at this time, does not waive any rights to collect the payments that come due during this forbearance period.

Debtor will resume Mortgage payments beginning June 1, 2023 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”).

Prior to the expiration of the forbearance period, Debtor must either (1) request additional forbearance time under Local Rule, State or Federal Law; (2) enter inter loss mitigation with Creditor; or (3) file an Amended Chapter 13 Plan which cures the arrears resulting from the forbearance period over the remainder of the Chapter 13 Plan.

Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.

22-20723 BKOBJ01

Respectfully Submitted,

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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Attorney for Creditor

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BARBARA ANN BUTLER

Case No. 1:22-bk-02337-HWV

Chapter 13

Freedom Mortgage Corporation,

Movant

vs.

BARBARA ANN BUTLER,

Debtor

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice Of Mortgage Forbearance Due To The Covid-19 Pandemic has been electronically served or mailed, postage prepaid on this day to the following:

BARBARA ANN BUTLER  
299 LEVEL ROAD  
HUMMELSTOWN, PA 17036

Kara Katherine Gendron, Debtor's Attorney  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101  
mottgendronecf@gmail.com

Jack N Zaharopoulos (Trustee), Bankruptcy Trustee  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

US Trustee  
United States Trustee  
228 Walnut Street, Suite 1190

22-20723 BKOBJ01

Harrisburg, PA 17101

March 1, 2023

/s/Mario Hanyon

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